

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re: James Wooden Debtor Vernice Wooden Joint Debtor NewRez LLC d/b/a Shellpoint Mortgage Servicing Movant v. James Wooden Vernice Wooden Debtor/Respondent KENNETH E. WEST, Esquire Trustee/Respondent	Bankruptcy No. 21-10885-amc Chapter 13 Hearing Date: November 12, 2024 Hearing Time: 11:00 a.m. Location: 900 Market Street, Suite 400 Philadelphia, PA 19107 Courtroom Number #4
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NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

NewRez LLC d/b/a Shellpoint Mortgage Servicing has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1); for costs and disbursements of this action, and for such other and further relief as to the Court may deem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the motion, then on or before November 1, 2024, you or your attorney must filed a response to the Motion. (see Instructions on next page).**

- (a) File an answer explaining your position at: 900 Market Street, Suite 400
Philadelphia, PA 19107.

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

- (b) Mail a copy to the movant's attorney:

Robert Shearer, Esquire
13010 Morris Rd., Suite 450
Alpharetta, GA 30004
Telephone: 470-321-7112
Email: rshearer@raslg.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. **A hearing on the Motion** is scheduled to be held before **Judge Ashely M. Chan** on **November 12, 2024, at 11:00 a.m.** in **Courtroom Number #4, United States Bankruptcy Court, 900 Market Street, Suite 400 Philadelphia, PA 19107.** Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing.**
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Dated: 10/17/2024

**Robertson, Anschutz, Schneid, Crane
& Partners, PLLC**
Attorney for Secured Creditor
13010 Morris Rd., Suite 450
Alpharetta, GA 30004
Telephone: 470-321-7112
By: /s/Robert Shearer
Robert Shearer
PA Bar Number 83745
Email: rshearer@raslg.com

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CERTIFICATE OF SERVICE OF NOTICE OF MOTION

I, the undersigned, certify under penalty of perjury that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on October 17, 2024, I served copies of the Notice of Motion upon the parties in interest in this proceeding, by first class U.S. Mail, postage prepaid or electronic mail, at the following addresses:

James Wooden
7728 Delphi Pl
Philadelphia, PA 19153

Vernice Wooden

7728 Delphi Pl
Philadelphia, PA 19153

JEFFREY M. CARBINO

Leech Tishman Fuscaldo & Lampl
1007 N Orange Street
Suite 420
Wilmington, DE 19801

ERIK B. JENSEN

Jensen Bagnato, PC
1500 Walnut St.
Suite 1510
Philadelphia, PA 19102

KENNETH E. WEST

Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

United States Trustee

Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107

Date: 10/17/2024

**Robertson, Anschutz, Schneid, Crane
& Partners, PLLC**

Attorney for Secured Creditor
13010 Morris Rd., Suite 450
Alpharetta, GA 30004
Telephone: 470-321-7112
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